

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF NEW YORK

MOOG INC.,

Plaintiff,

v.

Case No.: 1:22-cv-00187

SKYRYSE, INC., ROBERT ALIN
PILKINGTON, MISOOK KIM, and DOES NOS.
1-50,

Defendants.

DECLARATION OF RENA ANDOH

RENA ANDOH, under penalty of perjury and pursuant to 28 U.S.C. § 1746,
declares the following to be true and correct:

1. My name is Rena Andoh. I am a partner at Sheppard, Mullin, Richter & Hampton LLP. I am over the age of 18 years old. I have personal knowledge of the matters set forth herein and if called as a witness, I could and would competently testify as to all facts set forth herein. I am counsel for plaintiff Moog Inc. (“Moog”) and I provide this declaration in support of Moog’s Opposition to defendant Skyryse, Inc.’s (“Skyryse”) Motion to Dismiss for Lack of Personal Jurisdiction or Venue or, in the Alternative, For a Change of Venue.

2. Attached as **Exhibit “A”** is a true and correct copy of Moog’s April 7, 2022 letter submission (and enclosed exhibits) to Magistrate Judge McCarthy, sent via e-mail at 8:01 a.m. EST on April 7, 2022.

3. In addition to the events described and included in **Exhibit “A”** above, a relevant timeline of events showing the amount of litigation activity by all parties, including Skyryse, is as follows:

- 3/11/22 – following days of negotiations (including telephonic and e-mail correspondence), the parties file a stipulation and order regarding the relief sought in Moog’s Motion for Temporary Restraining Order (ECF 25);
- 3/17/22 – following days of negotiation (including telephonic and e-mail meet and confer correspondence), the parties file a stipulation and order regarding expedited discovery (ECF 33);
- 3/23/22 – all defendants, including Skyryse, serve written discovery requests;
- 3/28/22 – all parties engage in a conference call with iDiscovery Solutions to start the retention process of a neutral forensics firm;
- 3/29/22 – Skyryse files two motions to dismiss (ECF 48, 49);
- 4/1/22 – engagement letter of iDiscovery Solutions is signed by all parties;
- 4/1/22 – Skyryse turns over two electronic devices and over 11,000 data files to iDiscovery Solutions; and
- 4/7/22 and 4/8/22 – all parties engage in two meet and confer conference calls regarding the issues set forth in Moog’s April 7 letter submission to Magistrate Judge McCarthy.

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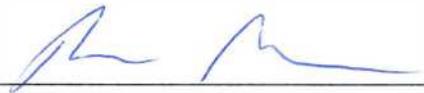
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I declare that the foregoing is true and correct under penalty of perjury under the laws of the United States of America.

Dated: April 12, 2022



Rena Andoh